

MORGAN, LEWIS & BOCKIUS LLP  
 Brian A. Herman (BH-0731)  
 Ryan J. Cooper (RC-0477)  
 101 Park Avenue  
 New York, NY 10178-0060  
 (212) 309-6000  
 (212) 309-6001 (fax)

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X		
ORLY CALDERON,	)	
	)	
Plaintiff,	)	Case No. 08-CV-1721
	)	
- against -	)	
	)	
THE PRUDENTIAL INSURANCE	)	
COMPANY OF AMERICA,	)	
	)	
Defendant,	)	
-----X		

-----X		
THE PRUDENTIAL INSURANCE	)	
COMPANY OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. 08-CV-2841
	)	
- against -	)	
	)	

DEBORAH ABRAMOVSKY, ORLY	)	<b>CERTIFICATION OF RYAN J. COOPER</b>
CALDERON, AVIVA ABRAMOVSKY,	)	
ABBA ABRAMOVSKY, DOV	)	
ABRAMOVSKY, AND ARI	)	
ABRAMOVSKY,	)	
Defendants,	)	
-----X		

I, RYAN J. COOPER, ESQ., of full age, certify:

- 1) I am a member of the Bar of this Court and an associate with the law firm of Morgan, Lewis & Bockius LLP, counsel for The Prudential Insurance Company of America ("Prudential") in the above-captioned litigation.

- 2) I make this certification in support of Prudential's Motion to Discharge Stakeholder and for Attorneys' Fees and Costs.
- 3) This is an action in interpleader arising from a dispute over life insurance benefits due and payable as a consequence of the death of one Abraham Abramovsky, insured as part of a group life insurance plan issued to Fordham University (the "Plan Benefits"). Prudential has had to remove and answer the complaint of Orly Calderon, file a complaint in interpleader, and move to deposit the disputed benefits with the Court. Prudential claims no interest to the benefits and has conceded liability under the group plan.
- 4) In the course of this litigation I have had several telephone conversations with Dov Abramovsky during which he repeatedly told me that he, his mother Deborah, his brother Abba, and his sister Aviva are all attorneys.
- 5) In the course of this litigation I have had one telephone conversation with Aviva Abramovsky during which she repeatedly told me that she, her mother Deborah, and her brothers Abba and Dov are attorneys.
- 6) The New York State Unified Court System's Attorney Search indicates that a Deborah Abramovsky, Aviva Abramovsky, and Dov Abramovsky are attorneys licensed to practice law in the State of New York. No record of an Abba Abramovsky was found. *See* New York State Unified Court System's Attorney Search.  
<http://iapps.courts.state.ny.us/attorney/AttorneySearch> (last visited on July 12, 2008).
- 7) In March 2008, Prudential, through counsel, sought a stipulation to have Prudential deposit the Plan Benefits with the Court and be discharged from liability once the cases were consolidated.
- 8) Orly Calderon, through counsel, agreed to such a stipulation.

- 9) On March 16, 2008, in response to Prudential's request, Deborah Abramovsky emailed that she was aware that in interpleader actions the depositing of the stake with the court and the discharge of the stakeholder was "what is generally done by the courts one way or the other." Attached as Exhibit A is a true and correct copy of the email thread between Deborah Abramovsky and Beth Black of Morgan Lewis.
- 10) In April, Dov Abramovsky informed me that the Abramovsky Claimants would not stipulate to Prudential's depositing the Plan Benefits with the Court. Dov Abramovsky did not offer an explanation other than to say that the Abramovsky Claimants thought it "unfair" to allow Prudential to be dismissed from the action.
- 11) On May 14, 2008, Prudential, through counsel, again sought the Abramovsky Claimants' consent to have the Plan Benefits deposited with the Court. I spoke with Dov Abramovsky who said the Abramovsky Claimants would not consent. I asked Dov Abramovsky to leave a message for Deborah Abramovsky (Deborah, Dov, and Ari Abramovsky share the same residence); Dov Abramovsky refused to deliver any messages. Reached by email several days later, Deborah Abramovsky refused to consent. I called Aviva Abramovsky and left a voicemail which was never returned. Attached as Exhibit B is a true and correct copy of the email thread between Deborah Abramovsky and Ryan J. Cooper.
- 12) On June 6, 2008, I received a call from an attorney named Doug Lerose, who said he had been retained by the Abramovsky Claimants for this matter. I asked Mr. Lerose if the Abramovsky Claimants would consent to Prudential's depositing the Plan Benefits with the Court. Mr. Lerose indicated that the Abramovsky Claimants would not. I have not heard from Mr. Lerose since June 6, 2008, and he has not filed a Notice of Appearance in this action.

13) All services related to this action were billed in tenths of an hour at the firm's standard hourly rates. In addition, all of the rates charged were consistent with the usual and customary rates charged by national law firms for equivalent services in this general geographic region.

14) Morgan Lewis has approximately 600 lawyers in its litigation practice group. Each of the principal attorneys that have worked on this matter has particular experience and expertise in litigation. In addition, experienced support staff has assisted counsel during the course of this litigation. The individuals who worked on the numerous pleadings and this motion include:

- a) Robert White -- Mr. White is a partner in the Princeton office of Morgan Lewis and joined the firm in 1993. He has over twenty-five years of litigation experience. His billing rate is \$750.00 per hour.
- b) Adrienne Ward -- Ms. Ward is a partner in the New York office of Morgan Lewis and joined the firm in 2000. She has over fourteen years experience in litigation. Her billing rate is \$620.00 per hour.
- c) Brian Herman -- Mr. Herman is a partner in the New York office of Morgan Lewis and joined the firm in 1999. He has over nine years of experience in litigation. His billing rate is 620.00 per hour.
- d) Jeremy Blumenfeld -- Mr. Blumenfeld is a partner in the Philadelphia office of Morgan Lewis and joined the firm in 2000. He has over ten years of experience in litigation. His billing rate is \$505.00 per hour.

- e) Beth Black – Ms. Black was an associate in the Chicago office of Morgan Lewis; Ms. Black left Morgan Lewis in April of this year. She has over eight years of experience in litigation. Her billing rate was \$455.00 per hour.
  - f) Dan Orr – Mr. Orr is a fourth year associate in the Princeton office of Morgan Lewis with four years of experience in litigation. His billing rate is \$415.00 per hour.
  - g) Katrina Langston – Ms. Langston is a fifth year associate in the Philadelphia office of Morgan Lewis. She has worked on several interpleader actions and has five years of litigation experience. Her billing rate is \$275.00.
  - h) Ryan Cooper – I am a second year associate in the litigation practice group in the New York office of Morgan Lewis. I have worked on several interpleader actions and numerous litigations in New York. My billing rate is \$375.00 per hour.
  - i) Charles Calvaruso – Mr. Calvaruso is the Managing Clerk in the New York office of Morgan Lewis. His billing rate is \$240.00 per hour.
  - j) Annette Young – Ms. Young is a paralegal in the Princeton office of Morgan Lewis. Her billing rate is \$240.00 per hour.
  - k) Albert Antenor – Mr. Antenor is a clerk in the New York office of Morgan Lewis. His billing rate is \$140.00 per hour.
  - l) John Coker – Mr. Coker is a clerk in the New York office of Morgan Lewis. His billing rate is \$140.00 per hour.
- 15) Attached as Exhibit C is a summary of all fees and expenses Prudential has incurred in this matter to date.
- 16) Attached as Exhibit D is a detailed schedule, with the time and description, of all fees Prudential has incurred in this matter to date.

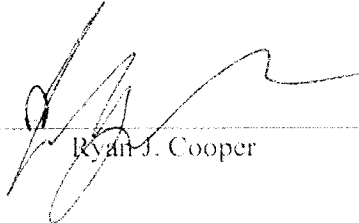
17) As detailed in the attached exhibits, Prudential expended \$31,133.50 in fees to research,

prepare, file and serve the complaint, answer the Calderon complaint, attempt to resolve the action without resort to motion practice, have the New Jersey action transferred and consolidated, answer counterclaims from all other parties, further attempt to resolve the action, and prepare this motion.

18) In addition to fees, Prudential spent \$549.77 in research, duplication, telephone, filing, courier, and related costs in connection with this litigation.

19) Prudential's total costs and fees incurred as a consequence of the dispute over the Plan Benefits is \$31,683.27.

20) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2008.

  
\_\_\_\_\_  
Ryan J. Cooper

Beth A. Black/CH/MLBLaw  
03/17/2008 09:53 AM

To "Deborah Abramovsky" <dabramovsky@yahoo.com>  
cc  
bcc  
Subject Re: Prudential matter

Thanks much. I will put together a stipulation for the parties to review.

Beth A. Black, Esq.  
Morgan, Lewis & Bockius LLP  
77 West Wacker Drive  
Sixth Floor  
Chicago, IL 60601  
312.324.1136  
Fax: 312.324.1001  
eFax: 877-432-9652  
bblack@morganlewis.com  
www.morganlewis.com

----- Original Message -----

From: "deborah abramovsky" [dabramovsky@yahoo.com]  
Sent: 03/16/2008 04:52 PM  
To: bblack@morganlewis.com  
Subject: Re: Prudential matter

Ms. Black, I looked up some cases and it seems that is what is generally done by the courts one way or the other. We can discuss the possibility when you are ready with the details.

Sincerely Debbie Abramovsky  
--- bblack@morganlewis.com wrote:

>  
>  
>  
>  
> Ms. Abramovsky- Pursuant to the parties'  
> stipulation, the case has been  
> dismissed from New Jersey and is on its way to the  
> Southern District of New  
> York. Once the case is on the New York court's  
> docket, I would like to  
> discuss the possibility of all the parties entering  
> into a stipulation  
> whereby Prudential will deposit the insurance  
> proceeds with the Court.  
> Once the proceeds are deposited, the Court can make  
> the determination as to  
> whom is entitled to receive the proceeds. This will  
> be an efficient means  
> which will speed up the process of the proceeds  
> ultimately being  
> distributed to the proper beneficiaries.  
>  
> Please let me know if you and your children are  
> willing to consider this

> option. I am willing to discuss it more at length  
> at your convenience.  
> Thank you.  
>  
>  
> Beth A. Black, Esq.  
> Morgan, Lewis & Bockius LLP  
> 77 West Wacker Drive  
> Sixth Floor  
> Chicago, IL 60601  
> 312.324.1136  
> Fax: 312.324.1001  
> eFax: 877-432-9652  
> bblack@morganlewis.com  
> www.morganlewis.com  
>  
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"deborah abramovsky"  
<dabramovsky@yahoo.com>  
05/24/2008 08:44 AM

To "Ryan J. Cooper" <rcooper@morganlewis.com>  
cc  
bcc  
Subject Re: Prudential matter

Mr. Cooper,  
I received your email. I never agreed to a stipulation allowing Prudential to leave the action they started. Do not leave messages with my son for me. If you wish to contact me, please do so by email

Sincerely

Deborah Abramovsky

--- "Ryan J. Cooper" <rcooper@morganlewis.com> wrote:

> Ms. Abramovsky,  
>  
> I'm an attorney with Morgan, Lewis & Bockius, and am  
> currently working on  
> the matter concerning the insurance proceeds. I am  
> writing to ask whether  
> or not you and your children are willing to  
> stipulate to having the  
> insurance proceeds deposited with the court. I  
> understand that you had  
> previously agreed to this with Beth Black, but am  
> aware that your position  
> may have changed. As you discussed with Beth, this  
> would be the quickest  
> and most efficient way to move this matter along.  
> Prudential will not  
> seek to recoup its legal fees if there is a  
> stipulation. On the other, if  
> there must be motion practice, Prudential will seek  
> to have its legal fees  
> reimbursed.  
>  
> I tried to reach you by phone by your son stated  
> that he would not deliver  
> any messages.

> The pleadings in the consolidated cases are now  
> closed and it is  
> appropriate to move the case forward. Please let me  
> know whether a  
> stipulation is acceptable. Thanks for your time and  
> please contact me  
> with any questions or concerns.

>  
> Regards,  
> Ryan J. Cooper

>  
> Ryan J. Cooper  
> Morgan, Lewis & Bockius LLP  
> 101 Park Ave.  
> New York, NY 10178  
> (212) 309-6671

> Fax: (212) 309-6001  
> rcooper@morganlewis.com  
> www.morganlewis.com  
>  
>  
>  
>  
> ----- Forwarded by Ryan J. Cooper/NY/MLBLaw on  
> 05/15/2008 11:20 AM -----  
>  
> Beth A. Black/CH/MLBLaw  
> 03/17/2008 09:53 AM  
>  
> To  
> "Deborah Abramovsky" <dabramovsky@yahoo.com>  
> cc  
>  
> Subject  
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>  
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> Subject: Re: Prudential matter  
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**Exhibit C - Fees and Costs Summary****Fees Summary by Task**

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
<i>Receipt and Review of File</i>			
J. P. Blumenfeld	.50	\$ 505.00	\$ 252.50
A. B. Young	4.70	\$ 240.00	\$ 1,128.00
Subtotals	5.20		\$1,380.50
<i>Analysis of Claims</i>			
R. A. White	2.10	\$ 750.00	\$ 1,575.00
A. M. Ward	.80	\$ 620.00	\$ 496.00
B. A. Herman	.40	\$ 620.00	\$ 248.00
B. A. Black	.80	\$ 455.00	\$ 364.00
R. J. Cooper	.50	\$ 375.00	\$ 187.50
Subtotals	4.60		\$2,870.50
<i>Preparation and Filing of Pleadings (Notice of Removal, Answer, and Interpleader Complaint)</i>			
B. A. Herman	.50	\$ 620.00	\$ 310.00
J. P. Blumenfeld	.60	\$ 505.00	\$ 303.00
B. A. Black	10.00	\$ 455.00	\$ 4,550.00
D. E. Orr	2.30	\$ 415.00	\$ 954.50
R. J. Cooper	17.30	\$ 375.00	\$ 6,487.50
K. M. Langston	4.70	\$ 275.00	\$ 1,292.50
Subtotals	35.40		\$13,897.50
<i>Document and File Management</i>			
C. M. Calvaruso	3.70	\$ 240.00	\$ 888.00
A. Antenor	5.60	\$ 140.00	\$ 784.00
J. Coker	.80	\$ 140.00	\$ 112.00
Subtotals	10.10		\$1,784.00
<i>Transfer and Consolidation of Case</i>			
B. A. Herman	.50	\$ 620.00	\$ 310.00
B. A. Black	6.20	\$ 455.00	\$ 2,821.00
D. E. Orr	3.00	\$ 415.00	\$ 1,245.00
R. J. Cooper	3.20	\$ 375.00	\$ 1,200.00
Subtotals	12.90		\$5,576.00
<i>Preparation and Filing of Motion to Interplead Funds</i>			
R. J. Cooper	15.00	\$ 375.00	\$5,625.00
Subtotals	15.00		\$5,625.00
<b>Hour Total:</b>	<b>83.20</b>	<b>Fee Total</b>	<b>\$31,133.50</b>

**Fees Summary by Individual**

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
R. A. White	2.10	\$ 750.00	\$ 1,575.00
A. M. Ward	.80	\$ 620.00	\$ 496.00
B. A. Herman	1.40	\$ 620.00	\$ 868.00
J. P. Blumenfeld	1.10	\$ 505.00	\$ 555.50
B. A. Black	17.0	\$ 455.00	\$ 7,735.00
D. E. Orr	5.30	\$ 415.00	\$ 2,199.50
R. J. Cooper	36.00	\$ 375.00	\$ 13,500.00
A. B. Young	4.70	\$ 240.00	\$ 1,128.00
K. M. Langston	4.70	\$ 275.00	\$ 1,292.50
C. M. Calvaruso	3.70	\$ 240.00	\$ 888.00
A. Antenor	5.60	\$ 140.00	\$ 784.00
J. Coker	.80	\$ 140.00	\$ 112.00
<b>Totals</b>	83.20		\$31,133.50

**Expense Summary**

<b>Expense</b>	<b>Total</b>
Local Travel	\$ 22.00
Telephone/Fax	\$ 29.93
Postage/Courier	\$ 33.39
Duplicating	\$ 36.10
Filing/Other Fees	\$350.00
Overtime Charges	\$ 45.00
Computer Legal Research	\$ 33.35
<b>Costs Total</b>	\$549.77

**Fee Total: \$31,133.50****Costs Total: \$ 549.77****Grand Total: \$31,683.27**

**Exhibit D – Attorneys’ Fees Detail**

<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Blumenfeld, J. P.	01/23/08	.40	Review new complaint.	\$505.00	\$202.00
Blumenfeld, J. P.	01/24/08	.50	Teleconference with opposing counsel in the matter; review pleadings; email client regarding case status.	\$505.00	\$252.50
Langston, K. M.	01/25/08	1.80	Review complaint; draft answer, Rule 7.1 disclosure statement and removal papers.	\$275.00	\$495.00
Langston, K. M.	01/28/08	.20	Draft answer, removal papers and Rule 7.1 disclosure statement in the matter.	\$275.00	\$55.00
Langston, K. M.	01/30/08	.60	Review complaint and pleadings; draft answer and removal papers in the matter.	\$275.00	\$165.00
Langston, K. M.	01/31/08	1.00	Draft answer and Rule 7.1 disclosure statement in the matter of Calderon v. Prudential.	\$275.00	\$275.00
Blumenfeld, J. P.	02/01/08	.10	Prepare answer.	\$505.00	\$50.50
Langston, K. M.	02/01/08	.30	Draft answer.	\$275.00	\$82.50
Langston, K. M.	02/04/08	.30	Confer with L. Giusti re service.	\$275.00	\$82.50
Blumenfeld, J. P.	02/06/08	.10	Prepare answer.	\$505.00	\$50.50
Black, B. A.	02/07/08	.50	Review complaint; conference with K. Langston regarding case.	\$455.00	\$227.5
Langston, K. M.	02/07/08	.50	Confer with B. Black re case status.	\$275.00	\$137.50
Black, B. A.	02/08/08	.50	Review case file.	\$455.00	\$227.50
Black, B. A.	02/13/08	.50	Revise Notice of Removal and answer.	\$455.00	\$227.50
Black, B. A.	02/14/08	1.20	Revise removal papers and answer; draft email to client regarding removal papers and answer.	\$455.00	\$546.00
Black, B. A.	02/15/08	1.20	Review additional pleadings filed in interpleader action; telephone conference with client.	\$455.00	\$546.00
Black, B. A.	02/19/08	1.00	Telephone conference with opposing counsel re removal of action; draft letter to opposing counsel regarding extension to answer complaint; finalize removal papers for filing.	\$455.00	\$455.00
Cooper, R. J.	02/19/08	.10	Email exchange with B. Black re documents to be filed in Southern District of New York.	\$375.00	\$37.50
Calvaruso, C. M.	02/20/08	.10	Drafted email to R. Cooper re filing removal papers	\$240.00	\$24.00
Herman, B. A.	02/20/08	.20	Review and sign removal papers.	\$620.00	\$124.00

<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Black, B. A.	02/20/08	.90	Telephone conference with D. Abramovsky regarding transfer of venue; draft motion for transfer of venue.	\$455.00	\$409.50
Cooper, R. J.	02/20/08	1.20	Prepare removal documents for filing.	\$375.00	\$450.00
Calvaruso, C. M.	02/21/08	.70	Arrange for filing of removal papers with SDNY for R. Cooper	\$240.00	\$168.00
Antenor, A.	02/21/08	2.80	File defendant's Notice of Removal at SDNY and filed Notice of Filing of Notice of Removal at Supreme Court, Bronx County, Bronx, New York.	\$140.00	\$392.00
Herman, B. A.	02/21/08	.30	Review, finalize and execute removal documentation.	\$620.00	\$186.00
Cooper, R. J.	02/21/08	2.00	Prepare and file removal papers.	\$375.00	\$750.00
Calvaruso, C. M.	02/22/08	.40	Submitted removal papers to case openings at SDNY	\$240.00	\$96.00
Black, B. A.	02/22/08	1.00	Review order regarding extension; exchange emails with R. Cooper regarding extension; draft email to opposing counsel regarding extension; review removal pleadings.	\$455.00	\$455.00
Cooper, R. J.	02/22/08	1.70	Document management; email conference with B. Black re Answer; draft stipulation and letter to the court for extension of time to answer.	\$375.00	\$637.50
Black, B. A.	02/25/08	2.20	Telephone conference with Wilson Elser regarding interpleader action; draft motion for substitution of counsel; telephone conference with D. Orr regarding motion to transfer venue; draft motion to transfer venue.	\$455.00	\$1001.00
Cooper, R. J.	02/25/08	.10	Review e-filing notices; email conference with B. Black re same.	\$375.00	\$37.50



<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Black, B. A.	02/26/08	2.50	Telephone conference with R. Cooper regarding SDNY action; finalize substitution of counsel; telephone conferences with D. Orr regarding motion to transfer venue; telephone conference with D. Abramovsky; telephone conferences with opposing counsel regarding transfer of venue; revise motion to transfer revenue.	\$455.00	\$1137.50
Cooper, R. J.	02/26/08	.40	Email correspondence with B. Black re stipulation on extension of time to answer; telephone conference with J. Epstein; review stipulation and prepare for filing.	\$375.00	\$150.00
Orr, D. E.	02/26/08	1.20	Prepare motion to transfer venue to SDNY.	\$415.00	\$498.00
Calvaruso, C. M.	02/27/08	.30	Submit stipulation to the SDNY for R. Cooper	\$240.00	\$72.00
Cooper, R. J.	02/27/08	.10	Review court's docket for recent activity.	\$375.00	\$37.50
Coker, J.	02/28/08	.80	Deliver document to Judge Loretta A. Preska at SDNY.	\$140.00	\$112.00
Herman, B. A.	02/28/08	.40	Review and sign answer.	\$620.00	\$248.00
Cooper, R. J.	02/28/08	.70	Prepare courtesy copy for Judge Preska; conference with B. Herman re same.	\$375.00	\$262.50
Orr, D. E.	02/28/08	1.80	Prepare stipulation transferring venue to Southern District of New York.	\$415.00	\$747.00
Herman, B. A.	02/29/08	.10	Review papers from opposing counsel.	\$620.00	\$62.00
Black, B. A.	02/29/08	.50	Finalize and email stipulation to transfer venue.	\$455.00	\$227.50
Orr, D. E.	02/29/08	.50	Revise stipulation to change of venue.	\$415.00	\$207.50
Calvaruso, C. M.	03/03/08	.10	Draft email to R. Cooper re state court filings	\$240.00	\$24.00
Black, B. A.	03/03/08	2.00	Draft and exchange emails with individual defendants regarding stipulation; draft and revise Answer and Affirmative Defenses to Defendants' Counterclaims.	\$455.00	\$910.00
Cooper, R. J.	03/03/08	.30	Review court docket for recent activity; conference with C. Calvaruso re filing of state court proceedings.	\$375.00	\$112.50

<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Black, B. A.	03/04/08	1.00	Exchange emails with A. Young regarding answer to counterclaims; draft substitution of counsel; finalize answer to counterclaim.	\$455.00	\$455.00
Young, A. B.	03/04/08	3.50	Telephone conferences and emails with counsel re substitution of attorney, answer to complaint and stipulation to transfer venue; review and revise answer and affirmative defenses; review correspondence from the court clerk re substitution of attorney; electronically file substitution of attorney with the court; review correspondences from the court clerk re answer to counterclaims.	\$240.00	\$840.00
Calvaruso, C. M.	03/04/08	.10	Forward orders to R. Cooper	\$240.00	\$24.00
Cooper, R. J.	03/04/08	.20	Review stipulation re extension of time to answer; review memorandum of Judge Preska re potential conflict.	\$375.00	\$75.00
Young, A. B.	03/10/08	.50	Preparation and electronic filing of correspondence upon the court; review correspondence from the court clerk re transfer of venue; review correspondence from the court clerk re letter to Judge W. Walls.	\$240.00	\$120.00
White, R. A.	03/10/08	1.30	Review correspondence with court; review filings.	\$750.00	\$975.00
Black, B. A.	03/10/08	.30	Conference with R. Cooper regarding transfer to SDNY.	\$455.00	\$136.50
Herman, B. A.	03/10/08	.10	Review revisions to answer.	\$620.00	\$62.00
Cooper, R. J.	03/10/08	.10	Check on status of change of venue stipulation.	\$375.00	\$37.50
Orr, D. E.	03/10/08	1.80	Prepare correspondence to court re transfer of venue.	\$415.00	\$747.00
Cooper, R. J.	03/11/08	.90	Review docket of New Jersey case; prepare for filing of New Jersey docket in Southern District of New York pursuant to stipulation of change of venue.	\$375.00	\$337.50
Young, A. B.	03/12/08	.20	Review correspondence from the court clerk re	\$240.00	\$48.00

Name	Date	Hours	Description	Rate	Amount
			transfer of venue.		
Cooper, R. J.	03/12/08	.70	Review docket of New Jersey case; prepare for filing of New Jersey docket in Southern District of New York pursuant to stipulation of change of venue.	\$375.00	\$262.50
Young, A. B.	03/14/08	.20	Review correspondence from the court clerk re transferring case to the SDNY.	\$240.00	\$48.00
White, R. A.	03/14/08	.80	Review filings with court.	\$750.00	\$600.00
Cooper, R. J.	03/14/08	.10	Check on status of transfer from District of New Jersey to Southern District of New York.	\$375.00	\$37.50
Black, B. A.	03/17/08	.90	Exchange emails with opposing counsel; conference with J. Epstein; draft Interpleader Stipulation.	\$455.00	\$409.50
Cooper, R. J.	03/17/08	.10	Review docket for new activity.	\$375.00	\$37.50
Cooper, R. J.	03/19/08	.10	Telephone conference with B. Black re transfer of venue of NJ action.	\$375.00	\$37.50
Young, A. B.	03/24/08	.10	Review correspondence from the court clerk re transferring case to southern district of New York.	\$240.00	\$24.00
Black, B. A.	03/24/08	.80	Exchange emails with R. Cooper regarding consolidation of cases; conference with opposing counsel regarding extension to answer.	\$455.00	\$364.00
Cooper, R. J.	03/24/08	.40	Review docket; email exchange with B. Black re stipulation on extension of time to answer and letter re motion to consolidate.	\$375.00	\$150.00
Calvaruso, C. M.	03/25/08	.50	File notice of appearance electronically and submit stipulation to orders clerk at SDNY for R. Cooper	\$240.00	\$120.00
Cooper, R. J.	03/25/08	.40	Review SDNY and DNJ docket; email conference with B. Black re status of change of venue; draft letter re motion to consolidate to Judge Preska.	\$375.00	\$150.00
Calvaruso, C. M.	03/26/08	.40	Filed notice of appearance of R. Cooper electronically.	\$240.00	\$96.00
Young, A. B.	04/01/08	.20	Review correspondence from the court clerk re transferring case to the SDNY.	\$240.00	\$48.00

<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Ward, A. M.	04/15/08	.20	Conference with R. Cooper re strategy; review letter to court; provide comments to R. Cooper.	\$620.00	\$124.00
Cooper, R. J.	04/15/08	1.00	Draft, review, edit, revise, and prepare letter to Judge Batts re status of case, motion to consolidate and docket from New Jersey.	\$375.00	\$375.00
Herman, B. A.	04/22/08	.30	Conference with R. Cooper in advance of court hearing.	\$620.00	\$186.00
Cooper, R. J.	04/22/08	.50	Conference with B. Herman re court conference; review pleadings in advance of same.	\$375.00	\$187.50
Cooper, R. J.	04/23/08	.90	Attend conference before Judge Preska re consolidation of cases; telephone conference with J. Epstein re same.	\$375.00	\$337.50
Cooper, R. J.	04/24/08	1.80	Draft, review, and revise Answer to Calderon complaint; conference with A. Ward re same; draft proposed form of order of consolidation; email exchanges with client re status of case.	\$375.00	\$675.00
Cooper, R. J.	04/25/08	1.10	Email conference with client re documents on New Jersey docket and two New York dockets.	\$375.00	\$412.50
Cooper, R. J.	04/28/08	.30	Finalize and file Answer to Complaint.	\$375.00	\$112.50
Cooper, R. J.	04/29/08	.10	Review order consolidating cases.	\$375.00	\$37.50
Cooper, R. J.	04/30/08	.20	File and document management; review correspondence from files of B. Black.	\$375.00	\$75.00
Ward, A. M.	05/14/08	.40	Review answer; telephone conference with R. Cooper re service issues.	\$620.00	\$248.00
Cooper, R. J.	05/14/08	3.40	Draft and revise stipulation; telephone conferences with D. Abramovsky re stipulation; telephone conference with A. Ward and J. Von Bevern re service of process on A. Abramovsky; research current residence of A. Abramovsky; draft answer to counterclaim.	\$375.00	\$1275.00
Calvaruso, C. M.	05/15/08	.50	Draft email to R. Cooper re computing time; file answer to counterclaim electronically; arrange for	\$240.00	\$120.00

Name	Date	Hours	Description	Rate	Amount
			issuance and service of summons on A. Abramovsky.		
Antenor, A.	05/15/08	2.00	Obtained issuance of Summons by court clerk at SDNY and served Summons and Complaint on A. Abramovsky at Madeline Lee Bryer PC, 60 East 42nd Street, New York, NY.	\$140.00	\$280.00
Cooper, R. J.	05/15/08	2.50	Research current address and workplace of A. Abramovsky for correct service of process; prepare complaint and summons for service on A. Abramovsky.	\$375.00	\$937.50
Calvaruso, C. M.	05/16/08	.30	Arranged for service of summons and complaint by mail; conversations with R. Cooper.	\$240.00	\$72.00
Cooper, R. J.	05/16/08	.20	Review returned executed summons for A. Abramovsky.	\$375.00	\$75.00
Calvaruso, C. M.	05/20/08	.20	Filed affidavit of service of summons and complaint electronically for R. Cooper.	\$240.00	\$48.00
Cooper, R. J.	05/20/08	.10	File proof of service of A Abramovsky.	\$375.00	\$37.50
Antenor, A.	05/21/08	.80	Filed Summons and Affidavit of Service at SDNY.	\$140.00	\$112.00
Cooper, R. J.	05/21/08	.20	Review Abramovsky's answers to Calderon's cross claim.	\$375.00	\$75.00
Cooper, R. J.	05/28/08	1.30	Draft, review and revise pre-motion conference request to Judge Preska re motion to interplead funds.	\$375.00	\$487.50
Ward, A. M.	05/29/08	.10	Review letter to Judge Preska.	\$620.00	\$62.00
Cooper, R. J.	05/29/08	.30	Review, revise and send pre-motion conference request to Judge Preska re motion to interplead.	\$375.00	\$112.50
Cooper, R. J.	06/06/08	.50	Review file in consideration of potential stipulation; telephone conference with D. LaRose (counsel for Abramovsky) re status of case and potential release; email with A. Ward and B. Herman re potential stipulation to release of funds.	\$375.00	\$187.50
Ward, A. M.	06/10/08	.10	Telephone conference with R. Cooper re next steps and strategy.	\$620.00	\$62.00

<b>Name</b>	<b>Date</b>	<b>Hours</b>	<b>Description</b>	<b>Rate</b>	<b>Amount</b>
Calvaruso, C. M.	06/10/08	.10	Forwarded order to R. Cooper.	\$240.00	\$24.00
Cooper, R. J.	6/16/2008	1.30	Draft motion for interpleader/discharge of stakeholder.	\$375.00	\$487.50
Cooper, R. J.	6/17/2008	.10	Review file in preparation for motion to interplead funds and discharge stakeholder.	\$375.00	\$37.50
Cooper, R. J.	6/18/2008	1.00	Draft motion to discharge stakeholder and interplead funds.	\$375.00	\$375.00
Cooper, R. J.	6/19/2008	1.30	Draft motion to discharge stakeholder and interplead funds.	\$375.00	\$487.50
Cooper, R. J.	6/30/2008	2.20	Draft and revise motion to interplead funds and for attorneys' fees and costs.	\$375.00	\$825.00
Cooper, R. J.	7/1/2008	2.20	Review, revise, and edit motion to interplead funds and discharge stakeholder.	\$375.00	\$825.00
Cooper, R. J.	7/2/2008	.60	Revise and draft motion to interplead funds and for attorneys fees and costs.	\$375.00	\$225.00
Cooper, R. J.	7/7/2008	1.60	Draft certification for fees and costs.	\$375.00	\$600.00
Cooper, R. J.	7/9/2008	1.20	Draft fee and cost Summary.	\$375.00	\$450.00
Cooper, R. J.	7/10/2008	.50	Revise and edit certification for attorneys' fees and costs and associated exhibits.	\$375.00	\$187.50
	<b>Total Hours:</b>	83.20		<b>Total Fees:</b>	\$31,133.50